IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

JIM ERICKSON and ERICKSON PRODUCTIONS, INC.,

Plaintiffs,

v.

MGM GRAND, INC., MGM RESORTS INTERNATIONAL, CRAMER-KRASSELT and JOHN DOES 1-10,

Defendants.

Case No. 13-cv-0564-NRB

ECF Case

NOTICE OF MOTION

PLEASE TAKE NOTICE that, on January 6, 2014 at 10:00 a.m. or as soon as the matter may be heard, defendants, MGM Resorts International, MGM Grand Hotel, LLC and Cramer-Krasselt Co. ("Defendants"), will move the Court to transfer this action to the United States District Court for the District of Nevada, pursuant to 28 U.S.C. § 1404(a), on the grounds described in the Memorandum of Law and accompanying documents in support hereof.

Respectfully submitted,

Dated: November 12, 2013

/s/ Jonathan D. Reichman
Jonathan D. Reichman (JR3243)
Margaret C. Lu (ML2295)
KENYON & KENYON LLP
One Broadway
New York, NY 10004
212-425-7200 (Telephone)
212-425-5288 (Facsimile)
jreichman@kenyon.com
mlu@kenyon.com

Jonathan Fountain (pro hac vice)
Michael McCue (pro hac vice)
LEWIS ROCA ROTHGERBER LLP
3993 Howard Hughes Pkwy.
Suite 600
Las Vegas, NV 89169
jfountain@lrrlaw.com
mmccue@lrrlaw.com

Attorneys for Defendants, MGM Resorts International, MGM Grand Hotel, LLC and Cramer-Krasselt Co.